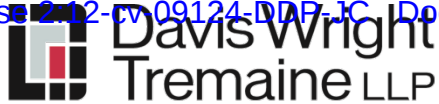


Exhibit A



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Bauer Publishing USA
Attn: Gregory A. Welch, Esq.
270 Sylvan Avenue
Englewood Cliffs, NJ 07632

October 28, 2013
Invoice No.

OCTOBER INVOICE FOR
STATEMENT OF
SERVICES AND DISBURSEMENTS

Matter No.: 0069628-000033
Tom Cruise v. Bauer Publishing Company

DATE	PROFESSIONAL	TIME	DESCRIPTION OF SERVICES
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REDACTED

PAYMENT IS DUE WITHIN 30 DAYS OF THE DATE OF THIS INVOICE
INTEREST WILL BE CHARGED ON INVOICES WHICH ARE 45 DAYS PAST DUE
PAYMENTS RECEIVED AFTER THE DATE OF THIS INVOICE WILL BE REFLECTED ON NEXT MONTH'S BILLING



Bauer Publishing USA
Invoice No
Page 2

<u>DATE</u>	<u>PROFESSIONAL</u>	<u>TIME</u>	<u>DESCRIPTION OF SERVICES</u>
			REDACTED



Bauer Publishing USA
Invoice No.
Page 3

DATE	PROFESSIONAL	TIME	DESCRIPTION OF SERVICES
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REDACTED



Bauer Publishing USA
Invoice No
Page 4

<u>DATE</u>	<u>PROFESSIONAL</u>	<u>TIME</u>	<u>DESCRIPTION OF SERVICES</u>
			REDACTED



Bauer Publishing USA
Invoice No.
Page 5

<u>DATE</u>	<u>PROFESSIONAL</u>	<u>TIME</u>	<u>DESCRIPTION OF SERVICES</u>
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REDACTED

09/20/13	D. Adler		
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09/20/13	J. Chase		
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review third set of requests for RFA (.4)

review third set of RFAs



Bauer Publishing USA
 Invoice No
 Page 6

<u>DATE</u>	<u>PROFESSIONAL</u>	<u>TIME</u>	<u>DESCRIPTION OF SERVICES</u>
			served on Bauer (.4)
09/21/13	D. Adler	1.10	Analyze third set of requests for RFA and send to Mr. Welch with email summarizing requests and response
09/22/13	D. Adler	7.10	Draft meet and confer letter responding to third set of requests for admission, including reviewing cases where courts granted protective orders, reviewing past discovery requests and responses in the case, reviewing past correspondence in the case, reviewing other publications reporting on Cruise
09/22/13	J. Chase		Research standard for granting a motion for a protective order in California district courts, California federal district court cases where parties have served harassing and irrelevant document requests with a particular focus on requests for admission, and the standards for awarding sanctions under Rule 37(a)(5) for succeeding on a discovery motion (5.5);
09/23/13	D. Adler		Review comments from E. McNamara and edits from J. Chase (.2); edit letter and send to Mr. Welch with comments (1.4); revise draft objections to RFAs (.3); confer by phone with Mr. Welch regarding objections to RFAs (.4);
09/23/13	J. Chase	5.90	Review and edit letter to Aaron Moss regarding third set of RFAs (.3); research cases where motion for protective order granted and motion for expenses under Rule 37 granted along with it, and draft string cite of the same to insert into letter to Aaron Moss (1.0); cite check letter (.7); draft responses and objections to Cruise's third set of requests for admission (3.9)
09/23/13	E. McNamara	1.10	Review and transmit comments to letter regarding protective order on Requests to Admit (.9); attend to strategy regarding same
09/24/13	D. Adler		confer with E. McNamara regarding meet and confer letter on 3rd set of RFAs (.1);



Bauer Publishing USA
 Invoice No.
 Page 7

<u>DATE</u>	<u>PROFESSIONAL</u>	<u>TIME</u>	<u>DESCRIPTION OF SERVICES</u>
			edit draft responses and objections to general objections and specific objections to 60 requests for admission and 13 exhibits attached thereto (1.9); final review and edit of meet and confer letter (.4);
09/24/13	E. McNamara	1.20	Attend to outstanding requests and strategy for same (.3); review and incorporate final changes to letter to Mr. Moss re. Bauer/anti-Semitism (.2); review letter from Mr. Moss regarding same (.5); e-mails to Mr. Welch regarding strategy (.2)
09/25/13	D. Adler		Review Moss' letter regarding Nazi claims and confer with E. McNamara regarding same (.4);
09/26/13	J. Chase	1.50	Revise and edit responses to third set of RFAs



Bauer Publishing USA
 Invoice No.
 Page 8

<u>DATE</u>	<u>PROFESSIONAL</u>	<u>TIME</u>	<u>DESCRIPTION OF SERVICES</u>
09/27/13	E. McNamara		Review letter from Mr. Moss regarding privilege and protective order (.6);
09/29/13	D. Adler		Review two meet and confer letters from opposing counsel and annotate for responses (.8); review draft of objections and responses to 3rd set of RFAs (.4)
09/30/13	E. McNamara		review draft responses to Requests to Admit and attend to strategy for response (.5);
Total Hours Worked			

DISBURSEMENT DETAIL

<u>DESCRIPTION</u>	<u>QUANTITY</u>	<u>AMOUNT</u>
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Davis Wright
Tremaine LLP

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Invoice No
Page 9

<u>DESCRIPTION</u>		<u>QUANTITY</u>	<u>AMOUNT</u>
	REDACTED		

Bauer Publishing USA
Invoice No.
Page 10

<u>DESCRIPTION</u>	<u>QUANTITY</u>	<u>AMOUNT</u>
Adler		
West Publishing (billed at cost) computerized legal research 09/22/13 per J.		
Chase	1	\$321.22
West Publishing (billed at cost) computerized legal research 09/23/13 per J.		
Chase	1	\$267.87

TOTAL SERVICES AND DISBURSEMENTS - THIS INVOICE

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SUMMARY BY PROFESSIONAL

<u>Professional</u>	<u>Billed Per Hours</u>
Partner	
McNamara, E.	576.00
Total	
Associate	
Adler, D.	436.50
Chase, J.	351.00
Total	
Paralegal	
Duffy, M.	207.00
Total	

Bauer Publishing USA
Invoice No.
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STATEMENT OF ACCOUNT

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Elizabeth A. McNamara



Davis Wright
Tremaine LLP

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Bauer Publishing USA
Attn: Gregory A. Welch, Esq.
270 Sylvan Avenue
Englewood Cliffs, NJ 07632

November 26, 2013
Invoice No.

NOVEMBER INVOICE FOR
STATEMENT OF
SERVICES AND DISBURSEMENTS

Matter No.: 0069628-000033
Tom Cruise v. Bauer Publishing Company

<u>DATE</u>	<u>PROFESSIONAL</u>	<u>TIME</u>	<u>DESCRIPTION OF SERVICES</u>
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10/01/13	D. Adler		
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research case law regarding objections to discovery
served on subsidiary that calls for admissions regarding
parent corporation and individual owners of the parent
corporation (.8)

10/01/13	E. McNamara		
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Attend to strategy regarding protective order and fact
gathering regarding same (.5);

attend to preparation for meet and
confer regarding protective order and related issues and
research allegations of requests to admit and e-mail to

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INTEREST WILL BE CHARGED ON INVOICES WHICH ARE 45 DAYS PAST DUE
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Bauer Publishing USA
Invoice No.
Page 2

<u>DATE</u>	<u>PROFESSIONAL</u>	<u>TIME</u>	<u>DESCRIPTION OF SERVICES</u>
			Mr. Welch regarding same (1.7)
10/02/13	E. McNamara		Telephone conference with Mr. Welch regarding strategy for protective order and gathering facts regarding same (.5);
10/04/13	D. Adler		Attend meet and confer with opposing counsel (.9); confer with E. McNamara regarding potential compromise regarding discovery disputes (.3); confer with opposing counsel regarding potential compromise (.3);
10/04/13	E. McNamara	3.00	Review correspondence regarding meet and confer and prepare for same (.7); attend meet and confer with Messrs. Moss and Fields and D. Adler regarding protective order (1.1); review proposal regarding same and strategize regarding same (.6); telephone conference with Mr. Welch regarding status and strategy (.6)
10/05/13	E. McNamara	1.10	Review and revise responses to Requests to Admit

Bauer Publishing USA
Invoice No.
Page 3

<u>DATE</u>	<u>PROFESSIONAL</u>	<u>TIME</u>	<u>DESCRIPTION OF SERVICES</u>
10/06/13	E. McNamara		Further review and revise responses to Requests to Admit (.8);
10/07/13	D. Adler		confer with E. McNamara regarding discovery disputes and responses to RFAs (.7); draft response to opposing counsel (.8);
			review email from opposing counsel regarding refusal to respond to RFAs on the basis of lack of knowledge and review case law cited (1.1); research case law regarding RFAs (.9); confer with E. McNamara regarding plaintiff's email and case law (.3);
10/07/13	E. McNamara		Finalize changes to Requests to Admit and multiple e-mails regarding same (1.4); e-mail to Mr. Welch regarding draft and changes to same (.5);
			attend to e-mails from Mr. Moss regarding Protective Order and legal basis for same (.4);
10/08/13	D. Adler		confer with E. McNamara regarding RFAs (.4);
			attend to issues regarding responses to Requests for Admissions, review law and telephone conference with Mr. Welch regarding same (1.7)

Bauer Publishing USA
Invoice No
Page 4

<u>DATE</u>	<u>PROFESSIONAL</u>	<u>TIME</u>	<u>DESCRIPTION OF SERVICES</u>
10/09/13	D. Adler		revise RFAs and confer with E. McNamara regarding same (1.8); research website referred to in RFAs (.6);
10/09/13	J. Chase		research obligation of reasonable inquiry in responding to requests for admission and draft memorandum e-mail to L. McNamara reflecting research (3.6); begin drafting email response to A. Moss regarding reasonable inquiry (0.9)
10/09/13	E. McNamara		Review and finalize response to Requests for Admission and transmit same (.9);
10/10/13	J. Chase	2.40	Draft response to e-mail from A. Moss regarding obligation to respond to third set of RFAs (2.4)
10/11/13	J. Chase		; create outline of motion for protective order and begin to draft sections (3.0)

Bauer Publishing USA
Invoice No.
Page 5

<u>DATE</u>	<u>PROFESSIONAL</u>	<u>TIME</u>	<u>DESCRIPTION OF SERVICES</u>
10/13/13	D. Adler	3.60	Review correspondence and discovery documents from Cruise's counsel regarding Nazi allegations and draft sections of motion for protective order regarding Cruise injecting Nazism into the action
10/14/13	D. Adler		Revise sections of motion for protective order regarding evidence produced during discovery, other reporting on plaintiff and Scientology, and standard for a protective order (1.9);
10/14/13	J. Chase	6.40	Research and draft motion for protective order
10/14/13	E. McNamara		draft e-mail regarding relevant testimony for motion for protective order (.9);
10/15/13	D. Adler		confer with J. Chase regarding revised motion for protective order (.2);
10/15/13	J. Chase		edit motion for protective order (1.1) Draft Notice of Motion (0.6); draft motion for protective order (5.0);
10/16/13	D. Adler	4.90	Confer with J. Chase regarding research of reporting on Scientology and Cruise's divorce (.2); draft and edit brief (4.7)

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Page 6

DATE	<u>PROFESSIONAL</u>	<u>TIME</u>	DESCRIPTION OF SERVICES
10/17/13	D. Adler		Draft brief (2.6); confer with E. McNamara and J. Chase regarding revisions (.6);
10/17/13	J. Chase	6.20	Draft declaration in support of motion for protective order and gather and compile exhibits in support of motion
10/17/13	E. McNamara		Review draft motion for protective order and begin to revise motion (1.8); review applicable law (.5); draft preliminary statement for motion (1.1);
10/18/13	J. Chase	6.40	Gather documents to attach to declaration of L. McNamara, revise declaration (5.3); revise draft of joint stipulation (1.1)
10/18/13	E. McNamara		Review and revise motion for protective order and review correspondence, exhibits and case law related to same (6.4);
10/19/13	E. McNamara	2.80	.Further review and revise motion for protective order
10/20/13	D. Adler	0.90	Review and edit revised motion for protective order (.9)
10/20/13	J. Chase	5.20	Confirm accuracy of deposition testimony cited from Dan Wakeford's transcript (0.3); confirm that no questions were asked about culture of religious bias at Bauer to any witness (1.2); add additional exhibits to the declaration (0.3); review and edit Joint Stipulation and revise declaration to reflect edits to Stipulation (3.4)
10/20/13	M. Duffy	2.50	Legal cite check of motion for protective order
10/20/13	E. McNamara		Further revise motion for protective order and transmit same to Mr. Welch for comments (2.3);
10/21/13	D. Adler	0.70	Confer with Mr. Welch regarding sealing confidential testimony and revisions to motion for protective order
10/21/13	J. Chase		Finalize and serve Joint Stipulation and declaration (5.1);



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Page 7

<u>DATE</u>	<u>PROFESSIONAL</u>	<u>TIME</u>	<u>DESCRIPTION OF SERVICES</u>
10/21/13	M. Duffy	4.60	revise, finalize and serve notice of motion and draft, finalize and serve proposed order (1.2) Check record cites in motion for protective order and exhibits against the declaration; enter edits in same and prepare exhibits to be scanned and served.

10/21/13 E. McNamara

review and revise declaration to accompany motion and notice of motion and proposed order (.8)

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<u>DATE</u>	<u>PROFESSIONAL</u>	<u>TIME</u>	<u>DESCRIPTION OF SERVICES</u>
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Bauer Publishing USA
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DISBURSEMENT DETAIL

<u>DESCRIPTION</u>	<u>QUANTITY</u>	<u>AMOUNT</u>
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<u>DESCRIPTION</u>	<u>QUANTITY</u>	<u>AMOUNT</u>
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West Publishing (billed at cost) computerized legal research 10/20/13 per M. Duffy	1	\$670.27
West Publishing (billed at cost) computerized legal research 10/21/13 per M. Duffy	1	\$193.98

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<u>DESCRIPTION</u>	<u>QUANTITY</u>	<u>AMOUNT</u>
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TOTAL SERVICES AND DISBURSEMENTS - THIS INVOICE

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SUMMARY BY PROFESSIONAL

<u>Professional</u>	<u>Billed Per Hours</u>
Partner	
McNamara, E.	576.00
Total	
Associate	
Adler, D.	436.50
Chase, J.	351.00
Total	
Paralegal	
Duffy, M.	207.00
Total	

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Invoice No. 6188805
Page 13

STATEMENT OF ACCOUNT

Elizabeth A. McNamara



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November 30, 2013
Invoice No.

NOVEMBER INVOICE FOR
STATEMENT OF
SERVICES AND DISBURSEMENTS

Matter No.: 0069628-000033
Tom Cruise v. Bauer Publishing Company

<u>DATE</u>	<u>PROFESSIONAL</u>	<u>TIME</u>	<u>DESCRIPTION OF SERVICES</u>
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<u>DATE</u>	<u>PROFESSIONAL</u>	<u>TIME</u>	<u>DESCRIPTION OF SERVICES</u>
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11/06/13	D. Adler		confer with E. McNamara and J. Chase regarding reply to plaintiff's opposition to motion for protective order (.3)
11/06/13	J. Chase		strategize with E. McNamara regarding supplemental brief (.3);

Bauer Publishing USA
Invoice No.
Page 3

DATE	<u>PROFESSIONAL</u>	<u>TIME</u>	DESCRIPTION OF SERVICES
11/06/13	E. McNamara		Review opposition to protective order and draft outline for reply (2.2);
11/07/13	J. Chase		Research and draft supplemental brief in support of motion for protective order (4.6); research whether the underlying case in Exhibit 1 to Galsor's declaration was dismissed, and draft e-mail to E. McNamara summarizing the same (.7);
11/08/13	J. Chase	2.80	Revise supplemental memorandum in support of motion for protective order
11/10/13	E. McNamara		Review draft reply memo of law regarding protective order and begin to revise (.5);
11/11/13	E. McNamara		review and revise supplemental memorandum of law on protective order (3.4); review case law regarding duty to investigate for Requests to Admit (.7);

Bauer Publishing USA
Invoice No.
Page 4

<u>DATE</u>	<u>PROFESSIONAL</u>	<u>TIME</u>	<u>DESCRIPTION OF SERVICES</u>
11/12/13	D. Adler		Revise supplemental reply (.3);
11/12/13	J. Chase		Review, revise and cite check supplemental memorandum to motion for protective order (1.3);
11/12/13	E. McNamara		Review and further revise supplemental memorandum of law and transmit to Mr. Welch (.9);

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Bauer Publishing USA
Invoice No. 6
Page 5

<u>DATE</u>	<u>PROFESSIONAL</u>	<u>TIME</u>	<u>DESCRIPTION OF SERVICES</u>
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Bauer Publishing USA
Invoice No.
Page 6

<u>DATE</u>	<u>PROFESSIONAL</u>	<u>TIME</u>	DESCRIPTION OF SERVICES
11/24/13	E. McNamara		; review motion for protective order and begin to review case law regarding same (1.5);
11/25/13	E. McNamara		prepare for hearing on protective order and motion to compel (3.9)
11/26/13	E. McNamara		Prepare for and attend court hearing on motion for protective order and motions to compel (2.6);

Bauer Publishing USA
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Page 7

DISBURSEMENT DETAIL

DESCRIPTION	<u>QUANTITY</u>	<u>AMOUNT</u>
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West Publishing (billed at cost) computerized legal research 10/07/13 per D. Adler	1	\$277.05

TOTAL SERVICES AND DISBURSEMENTS - THIS INVOICE

SUMMARY BY PROFESSIONAL

<u>Professional</u>	<u>Billed Per Hours</u>
Partner McNamara, E.	576.00
_____	_____



Bauer Publishing USA
Invoice No.
Page 8

Associate

Adler, D.	436.50
Chase, J.	351.00

Paralegal

Duffy, M.	207.00
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STATEMENT OF ACCOUNT

Elizabeth A. McNamara



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